



BellSouth Telecommunications, Inc.  
Suite 2101  
333 Commerce Street  
Nashville, Tennessee 37201-3300

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RECEIVED  
REGULATORY AUTHORITY  
1999 OCT 20 PM 3 39

Guy M. Hicks  
General Counsel

October 20, 1999

**VIA HAND DELIVERY**

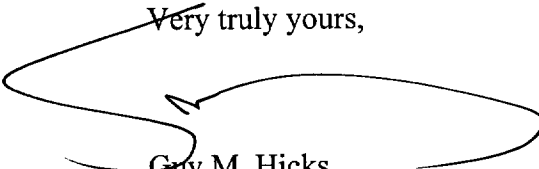
David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Petition by ICG Telecom Group, Inc. for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. pursuant to Section 252(b) of the Telecommunications Act of 1996*  
Docket No. 99-00377

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Responses to ICG's 1<sup>st</sup> Request for Production. Copies of the enclosed are being provided to counsel of record for all parties. Responses containing proprietary information are being submitted under separate cover.

Very truly yours,



Guy M. Hicks

GMH/jem

Enclosure

FILE

## CERTIFICATE OF SERVICE

I hereby certify that on October 20, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Gary Hotvedt, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Henry Walker, Esquire  
Boult, Cummings, et al.  
414 Union Ave., #1600  
P. O. Box 198062  
Nashville, TN 37219-8062

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BellSouth Telecommunications, Inc.

Tennessee Regulatory Authority

Docket No. 99-00377

ICG's 1<sup>st</sup> Request for Production

September 15, 1999

Item No. 1

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CLERK OF THE  
EXECUTIVE SECRETARY

**REQUEST:** Please provide copies of the most recent cost studies prepared by or for BellSouth which show the recurring and non-recurring costs of providing each of the following types of unbundled local loops:

- a. 2-Wire Analog Voice Grade Loop
- b. 4-Wire Analog Voice Grade Loop
- c. 2-Wire ISDN (BRI) Digital Grade Loop
- d. 2-Wire ADSL-Compatible Loop
- e. 2-Wire HDSL-Compatible Loop
- f. 4-Wire HDSL-Compatible Loop

Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

**RESPONSE:** For nonrecurring and recurring costs, the following cost studies have been filed with the Tennessee Regulatory Authority in Docket No. 97-01262:

Cost Study
2-Wire Analog Voice Grade Loop
4-Wire Analog Voice Grade Loop
2-Wire ISDN Digital Grade Loop
2-Wire ADSL Compatible Loop
2-Wire HDSL Compatible Loop
4-Wire HDSL Compatible Loop

These cost studies contain proprietary information and are being provided (by electronic copy) subject to the terms of the Protective Order entered in this proceeding.

**FILE**

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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**REQUEST:** Please provide the most recent cost studies prepared by or for BellSouth which show the recurring and non-recurring costs of providing interoffice transport to ICG or other telecommunications carriers as may be required to transport traffic from BellSouth's end office where unbundled loops are ordered to another BellSouth end office or tandem switch. Please identify the cost separately for DS-1 dedicated and DS-3 dedicated transport. Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

**RESPONSE:** For nonrecurring and recurring costs, the following cost studies have been filed with the Tennessee Regulatory Authority in Docket No. 97-01262.

Cost Study
Interoffice Transport-Dedicated-Voice Grade
Interoffice Transport-Dedicated-DS0-56/64 KBPS
Interoffice Transport-Dedicated-DS1

These cost studies contain proprietary information and are being provided (by electronic copy) subject to the terms of the Protective Order entered in this proceeding. (See ICG's First Request for Production, Item No. 1). A cost study for Interoffice Transport-Dedicated-DS3 has not been filed for Tennessee.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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**REQUEST:** Provide the most recent cost studies prepared by or for BellSouth which show the recurring and non-recurring cost of providing analog and digital cross-connections required to connect an unbundled local loop to the ICG system and/or other telecommunications carrier systems. Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

**RESPONSE:** For nonrecurring and recurring costs, the following cost studies have been filed with the Tennessee Regulatory Authority in Docket Nos. 97-01262 and 99-00430:

Cost Study
Physical Collocation
Virtual Collocation

These cost studies contain proprietary information and are being provided (by electronic copy) subject to the terms of the Protective Order entered in this proceeding. (See ICG's First Request for Production, Item No. 1). Also, attached is an electronic copy containing the proprietary study for Docket No. 99-00430.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide copies of the most recent cost studies prepared by or for BellSouth which show the recurring and non-recurring costs of each of the following types of entrance facility:

- a. DS-3;
- b. OC-3;
- c. OC-12; and
- d. OC-48.

Please separately identify non-recurring costs, recurring costs, fixed costs and distance-related costs. Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

RESPONSE: BellSouth objects to this Data Request on the grounds that the information requested is not relevant to any issue in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, BellSouth has not conducted the requested cost study in Tennessee.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide copies of the most recent cost studies prepared by or for BellSouth which show the recurring and non-recurring costs of each of the following types of transport as an unbundled network element:

- a. OC-3;
- b. OC-12; and
- c. OC-48.

Please separately identify non-recurring costs, recurring costs, fixed costs and distance-related costs. Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation,

RESPONSE: See response to POD Item No. 2 for proprietary Interoffice Transport cost studies that have been filed for Tennessee. These studies utilize TELRIC methodology with fixed costs identified as shared and common costs. The recurring costs are distance-related.

Interoffice transport cost studies have not been filed for Tennessee for OC-3, OC-12, or OC-48.

BellSouth Telecommunications, Inc.  
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REQUEST: Please provide copies of the most recent cost studies prepared by or for BellSouth which show the recurring and non-recurring costs of channelization and/or multiplexing required to convert (1) voice-grade unbundled loops (DS-0) to DS-1 level for connection with the ICG and/or other telecommunications carrier transport and (ii) DS-1 unbundled loops to DS-3 level for connection with the ICG and/or other telecommunications transport. Please separately identify non-recurring costs, recurring costs, fixed costs and distance-related costs. Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

RESPONSE: For nonrecurring and recurring costs, the following cost study has been filed with the Tennessee Regulatory Authority in Docket No. 97-01262.

Cost Study
Loop Channelization and CO Interface (Inside CO)

This study utilizes TELRIC methodology with fixed costs identified as shared and common costs. The recurring costs are not distance-related.

These cost studies contain proprietary information and are being provided (by electronic copy) subject to the terms of the Protective Order entered in this proceeding. (See ICG's First Request for Production, Item No. 1). A cost study has not been filed for Tennessee for the multiplexing required to convert DS1 unbundled loops to DS3.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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ICG's 1<sup>st</sup> Request for Production  
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REQUEST: For each service identified in your response to Interrogatory No. 26 in ICG's First Set of Interrogatories:

- a. Provide copies of the relevant tariff pages describing: (i) the service or services and (ii) the recurring and non-recurring rates that apply thereto;
- b. To the extent such service arrangements are covered by contracts in lieu of or in addition to BellSouth tariffs, provide:
  - i. a copy of BellSouth's standard form contract(s) for such arrangements, and
  - ii. the number of such contracts currently in effect with (a) retail customers and (b) CLECs; and
- c. Provide copies of any cost studies prepared in support of charges for such arrangements. Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

RESPONSE: The services identified in BellSouth's response to Interrogatory No. 26 are contained in BellSouth's GSST tariff which is publicly available on BellSouth's website at [www.bellsouth.com](http://www.bellsouth.com).

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide copies of all contracts with BellSouth retail customers that include pricing not reflected in BellSouth tariffs.

RESPONSE: BellSouth objects to this Request for Production on the grounds that the information requested is not relevant to the issues in this arbitration nor is it reasonably calculated to lead to the discovery of admissible evidence.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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**REQUEST:** Please provide the complete working copy of each cost study that has been or is being prepared by or on behalf of BellSouth demonstrating the cost differences, if any, between transporting and terminating ISP-bound traffic and other types of local traffic, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

**RESPONSE:** See response to Interrogatory Item No. 33. Cost studies have not been prepared.

BellSouth Telecommunications, Inc.  
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**REQUEST:** Provide the most recent cost studies prepared by or for BellSouth relating to local traffic transport and termination (including end office switching, transport, and tandem switching). Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

**RESPONSE:** For nonrecurring and recurring costs, the following cost studies have been filed with the Tennessee Regulatory Authority in Docket No. 97-01262.

Cost Study
Local Switching
Common Transport
Tandem Switching

These cost studies contain proprietary information and are being provided (by electronic copy) subject to the terms of the Protective Order entered in this proceeding. (See ICG's First Request for Production, Item No. 1).

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide copies of each of the contracts, if any, that govern the rates, terms, and conditions under which BellSouth terminates local or toll traffic for independent, incumbent local exchange carriers.

RESPONSE: BellSouth objects to this Request for Production on the grounds that the information requested is not relevant to this arbitration nor is it reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this Request on the grounds that the agreements between BellSouth and Incumbent Local Exchange Companies (Independent Companies) were in effect prior to 1996 and basically pertain to IntraLATA Toll traffic between separately owned, non-competitive exchange areas. Since the Federal Telecommunications Act of 1996, agreements between BellSouth and CLECs have been established to regulate local traffic between competitive companies within the same exchange areas.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide a copy of each tariff, if any, that governs the rates, terms, and conditions under which BellSouth terminates local or toll traffic for independent, incumbent local exchange carriers.

RESPONSE: BellSouth objects to this Request for Production on the grounds that it seeks the production of information that is publicly available. BellSouth's tariffs are available on its website at [www.bellsouth.com](http://www.bellsouth.com).

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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**REQUEST:** Please provide copies of each of the contracts, if any, that govern the rates, terms, and conditions under which independent, incumbent local exchange carriers terminate local or toll traffic for BellSouth.

**RESPONSE:** BellSouth objects to this Request for Production on the grounds that the information requested is not relevant to this arbitration nor is it reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this Request on the grounds that the agreements between BellSouth and Incumbent Local Exchange Companies (Independent Companies) were in effect prior to 1996 and basically pertain to IntraLATA Toll traffic between separately owned, non-competitive exchange areas. Since the Federal Telecommunications Act of 1996, agreements between BellSouth and CLECs have been established to regulate local traffic between competitive companies within the same exchange areas.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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ICG's 1<sup>st</sup> Request for Production  
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REQUEST: Please provide a copy of each tariff, if any, that governs the rates, terms, and conditions under which independent, incumbent local exchange carriers terminate local or toll traffic for BellSouth.

RESPONSE: BellSouth objects to this Request for Production on the grounds that it seeks the production of information that is publicly available. BellSouth's tariffs are available on its website at [www.bellsouth.com](http://www.bellsouth.com).



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide the most recent cost studies prepared by or for BellSouth relating to each of the following:

- a. LIGHTgate/SMARTgate;
- b. SMARTpath;
- c. SMARTring.

Please provide the complete working copy of each cost study, including a complete working copy of all computerized models involved in preparing the cost estimate with data intact; a complete set of work papers with all special studies, data sources, data inputs and assumptions; and a complete set of cost study documentation.

RESPONSE: The following cost studies have been completed for Tennessee:

LightGate® Service (Private Line)  
SmartGate® Service (Special Access)  
SmartPath® Service (Private Line and Special Access)  
SmartRing® Service (Private Line and Special Access)

These cost studies contain proprietary information and are being provided (by electronic copy) subject to the terms of the Protective Order entered in this proceeding. (See ICG's First Request for Production, Item No. 1).

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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ICG's 1<sup>st</sup> Request for Production  
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REQUEST: Provide copies of all contracts or agreements between BellSouth and any IXC, CLEC, CMRS, or retail customers that contain self-effectuating enforcement mechanisms, including but not limited to liquidated damages provisions and provisions for waiver, reduction or adjustment of recurring or nonrecurring charges.

OBJECTION: BellSouth objects to this Interrogatory on the grounds that it is overly broad and burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, and in an effort to be responsive, BellSouth offers the following: pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, BellSouth has entered into numerous interconnection and CMRS agreements with CLECs operating in Tennessee. All such agreements are filed with the Tennessee Regulatory Authority as a public document. ICG may wish to review such agreements to obtain the date on which such agreements were executed and the nature of the agreements.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide any documents concerning the March 10, 1999 meeting between representatives of BellSouth and representatives of the FCC's Common Carrier Bureau's Policy and Program Planning Division with respect to self-executing enforcement mechanisms applicable to BellSouth's nondiscriminatory access to unbundled network elements and the functionalities provided by its operation support systems.

RESPONSE: See attachment associated with Item No. 51.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 99-00377  
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REQUEST: Please provide copies of all documents evidencing any contract, agreement, understanding or other arrangement between BellSouth Telecommunications, Inc. and BellSouth.net, Inc. relating to:

- a. the provision of equipment or services by either party to the other;
- b. the payment of money by either party to the other; or
- c. an accounting transfer of any type by either party to the other.

RESPONSE: BellSouth objects to this Request for Production on the grounds that the information requested is not relevant to any issue in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide copies of all documents evidencing any contract, agreement, understanding or other arrangement between BellSouth Telecommunications, Inc. and any affiliated entity other than BellSouth.net, Inc. relating to the BellSouth.net service.

RESPONSE: BellSouth objects to this Request for Production on the grounds that the information requested is not relevant to any issue in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 99-00377  
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REQUEST: Please provide copies of all documents evidencing any contract, agreement, understanding or other arrangement between BellSouth Telecommunications, Inc. and/or BellSouth.net, Inc., on the one hand, and any ISP or provider of Internet backbone services, on the other, related to the offering or provision by BellSouth Telecommunications, Inc., BellSouth.net, Inc., or an ISP of Internet services or Internet access services.

RESPONSE: BellSouth objects to this Request for Production on the grounds that the information requested is not relevant to any issue in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
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REQUEST: Please provide copies of all forms of the subscriber agreement for BellSouth.net services.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not relevant to any issue in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 99-00377  
ICG's 1<sup>st</sup> Request for Production  
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REQUEST: Please provide copies of all documents evidencing any tariffs, contracts, agreements, memoranda of understanding, or other arrangements pursuant to which BellSouth has committed to construct, acquire, or provision specific telecommunications transport or switching facilities or capacity, or a specific quantity of telecommunications transport or switching capacity, based upon a forecast by any LEC, IXC, ISP, or retail customer of the amount or quantity of such telecommunications transport or switching facilities or capacity required to transport or switch a future volume of telecommunications traffic.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, BellSouth will make its independent company contracts available for inspection. BellSouth's CMRS and CSAs are on file with the Tennessee Regulatory Authority and are publicly available.



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 99-00377  
ICG's 1<sup>st</sup> Request for Production  
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REQUEST: To the extent not provided in your responses to the foregoing Requests for Production of Documents, please provide copies of all documents, memoranda and any other materials reviewed or relied upon in responding to ICG's First Set of Interrogatories or identified in your responses to ICG's First Set of Interrogatories.

RESPONSE: BellSouth has no additional documents.